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June 16, 2022

BY ECF

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: Stanbro v. Palou, et al, SDNY 20 CV. 1591 (KMK)

Dear Judge Karas:

This Office represents Defendants Leonardo, Landry, Pagliaro and Torres in the above-referenced action. We write to respectfully inform the Court and the parties to this action (and in Stanbro v. Westchester County Health Care Corporation, et al., 19 Civ. 10857 (KMK)) that yesterday we learned that defendant Gary Pagliaro died on April 12, 2022. A Suggestion of Death has been filed via ECF. In March 2022, this office had spoken to him about the upcoming trial, at which time it was confirmed that, due to his medical condition, he would need to testify at trial via videoconference from Texas. This office had reached out to him in the last few weeks to coordinate matters regarding his anticipated trial testimony in the trial that is scheduled to begin June 27, 2022, but had not heard back from him.

We thank the Court for its consideration in this matter.

Respectfully submitted,
/s/ Jeb Harben

Jeb Harben
Assistant Attorney General

cc: Counsel of Record
By ECF